

**MEMO ENDORSED**

May 5, 2021

**VIA ECF**

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** May 6, 2021

Re: Mayagüez SA. v. Citigroup, Inc., et al., Case No. 16 Civ. 06788 (PGG) (JLC)

Dear Judge Gardephe:

We write on behalf of all parties to this action. In accordance with paragraph I(D) of Your Honor's Individual Rules of Practice (the "Rules of Practice"), Defendants request a 14-day extension (to which Plaintiff consents) for the parties' time to file any objections, and responses to any such objections, to the Report and Recommendation of Magistrate Judge James L. Cott (the "R&R") with respect to the parties' motions for summary judgment.

The R&R, transmitted to the parties on April 30, 2021, is over 70 pages and addresses motions for summary judgment and related motions filed by both sides under both Colombian and New York law with respect to Plaintiff's 11-count complaint. Under the applicable rules, the parties' objections to the R&R would be due within 14 days of transmittal, *i.e.*, May 14, and responses to such objections would be due 14 days after service of such objections. *See* FRCP Rule 72(b). The following brief extension is requested to permit the parties to assess and address any potential objections and responses thereto: the parties shall file any objections to the R&R on or before May 28, 2021; and the parties shall file any responses to any such objections on or before June 25, 2021.

No extension of time has been sought previously for these deadlines.

Respectfully submitted,

/s/ Gabriel F. Soledad

Juan P. Morillo  
Gabriel F. Soledad  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
1300 I Street NW, Suite 900  
Washington, D.C. 20005  
Tel. 212-849-8000  
juanmorillo@quinnemanuel.com  
gabrielsoledad@quinnemanuel.com  
*Attorneys for Plaintiff*

/s/ Agnès Dunogué

Adam S. Hakki  
Agnès Dunogué  
SHEARMAN & STERLING LLP  
599 Lexington Avenue  
New York, NY 10022  
Tel. 212-848-4924  
Tel. 212-848-5257  
ahakki@shearman.com  
agnes.dunogue@shearman.com  
*Attorneys for Defendants*